

EXHIBIT 1

SPS

**COMMONWEALTH OF VIRGINIA
CIRCUIT COURT OF FAIRFAX COUNTY
4110 CHAIN BRIDGE ROAD
FAIRFAX, VIRGINIA 22030
703-691-7320
(Press 3, Press 1)**

Satyajit Sanyal vs. Toyota Motor Corporation

**CL-2014-0008174
Defendant: Toyota Motor Corporation**

**TO: Toyota Motor Corporation
19001 South Western Avenue
Torrance CA 90501**

SUMMONS – CIVIL ACTION

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the Clerk's office of this Court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment or decree against such party either by default or after hearing evidence.

APPEARANCE IN PERSON IS NOT REQUIRED BY THIS SUMMONS.

Done in the name of the Commonwealth of Virginia, on June 23, 2014.

JOHN T. FREY, CLERK

**By: [Signature]
Deputy Clerk**

Plaintiff's Attorney: Pro Se

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

SATYAJIT SANYAL, Pro Se

Plaintiff

Vs.

TOYOTA MOTOR CORPORATION

19001 South Western Avenue,

Torrance, California – 90501

Defendant

CL - 2014 08174

JURY TRIAL REQUESTED

FILED
CIVIL DIVISION
JUL 18 PM 3:14
CLERK OF COURT

Complaint

COMES NOW the Plaintiff, SATYAJIT SANYAL, by Pro Se, and moves for judgment against the Defendant, TOYOTA MOTOR CORPORATION, on the grounds and in the amount as hereinafter set forth:

1. The Plaintiff, adult, resident of Virginia, purchased New TOYOTA CAMRY (Model year 2011; VIN Number 4T1BF3EK9BU658720) equipped with Airbags, on November 19th, 2010 from authorized Toyota Dealer located in Virginia.
2. On July 10th, 2012, at approximately 10:20 AM, the Plaintiff was driving to work, in the above-mentioned TOYOTA CAMRY (Virginia Vehicle Plate Number: XGK 4066) Northeast on Herndon Parkway in Herndon, Fairfax County, Virginia, during which the Toyota Camry crashed head-on with fixed object (a tree) and the Plaintiff faced life-threatening and permanent physical and personal injuries in this incident due to not deploying of any of the driver side airbags despite the significant damaging impact and strong forces involved in the front end vehicle collision with a fixed object causing substantial damages to the vehicle.

3. The following were reported on July 10th, 2012 in the Police Crash report number 201202821, documented by the investigating Police Officer:
 - a. The Toyota Camry was being driven by the Plaintiff.
 - b. The Toyota Camry, single vehicle ran off the road eastbound on the right, travelled on the sidewalk for a short distance before veering to the left, crossing the westbound traffic lanes and struck a tree off the roadway.
 - c. There was significant Front End damage to the vehicle.
 - d. Airbags were not deployed in this head-on collision with fixed object, in this case a tree.
 - e. The motor had stalled out, the doors of the vehicle were locked.
 - f. The Plaintiff appeared to have lost consciousness.
 - g. Police Officers utilized a haligan bar to provide emergency, potentially Life-Saving entry into the vehicle to not only access the Plaintiff, but provide airflow into the vehicle on a near 90 degree day.
 - h. Once access was gained and fresh air entered the vehicle, the Plaintiff gained a low degree of consciousness but was unable to speak.
 - i. Rescue Personnel arrived on scene, screened the Plaintiff for a diabetic emergency with negative results but did note significantly diminished response from the left side of his body
 - j. The Plaintiff was transported by Medic Ambulance to Reston Hospital
4. After the vehicle crash, the Plaintiff was admitted to the Critical Care Unit of Reston Hospital on July 10th, 2012 till July 12th, 2012.
5. The Plaintiff would like to bring to attention recent acknowledged reports from Toyota announcing airbags issues across various models of Toyota cars including Camry. The contents of the reports especially surrounding the airbags issues may be noteworthy as a contributing probable cause for the life-threatening physical and personal injuries suffered by the plaintiff due to failure of deployment of airbags in the vehicle crash incident of July 10th, 2012.

6. The post-crash photographs of the Plaintiff's vehicle Toyota Camry, clearly displays the reported significant Front End damage on the Driver side of the vehicle and in-line with the steering wheel of the car.
7. The substantial Circumstantial Evidences documented in the Police Crash Report and post-crash Photographs of the vehicle Toyota Camry, demonstrates significant Probable cause that due to the failure in deployment of any of the driver side Airbags in response to the damaging impact and strong forces caused upon crashing of the Toyota Camry with the tree, caused the Plaintiff's head and face to crash into the Steering wheel of the car, causing Facial and Scalp Contusions, aggravating post traumatic Seizure activity, loss of consciousness and an life-threatening traumatic incident.
8. As a direct and proximate result thereof, Plaintiff suffered serious and permanent head injuries aggravating Seizure activities and is dependent on expensive prescription medications, has to undergo expensive diagnostic testing such as EEG and CT Scans, preventative care and medical treatment for life-time or till cured.
9. The Plaintiff is an Information Technology Professional, a profession of knowledge, thinking and continuous learning for attaining new skills and updates, all of which imposes substantial challenges and demands on the brain and body to perform day-to-day work and retaining information and the job in a highly competitive, challenging, ever changing and evolving profession. An Information Technology professional is generally expected to have an overall healthy brain and body that can perform quickly, can handle time-sensitive, fast-paced and demanding situations at work.
10. In February 2014, upon medical tests, CT Scans and further diagnosis, significant increases in the prevailing dosage of Plaintiff's prescription medications were recommended by the Doctor.
11. The physical injuries suffered by the Plaintiff during the vehicle crash incident, intake of prescribed medications for treating the injuries, aggravated conditions and side effects caused by the injuries and medications, are substantially deteriorating Plaintiff's ability to place challenging demands on his brain and body. As a proximate result, the Plaintiff is compelled to lookout for jobs that are less demanding on his


brain and body. These types of jobs do not pay wages equivalent to Plaintiff's wages earned at the time of the incident in 2012.

12. As a proximate result of the Plaintiff's Physical and Personal Injuries caused during this vehicle crash incident, to stay in active work-life, the Plaintiff has to work at reduced wages, thus reducing his earning capacity as well. As a proximate result thereof, the Plaintiff is unable to meet his financial obligations for paying existing debt, pay for ever increasing cost of living expenses, home mortgage, monthly home association fees, car loan, utilities bills, other personal expenses, past, present or future bills for hospital, doctors, related health care and life care in an effort to lead a normal healthy lifestyle and be cured of the aforementioned physical and personal injuries caused by this life-threatening vehicle crash incident.
13. Medical expenses of over \$25,000 were claimed towards hospitalization in the Critical Care Unit from July 10th, 2012 till July 12th, 2012. Noteworthy would be the medical expenses for a 3 day treatment.
14. Vehicle damage repair expenses of over \$11,000 were claimed and paid by Plaintiff's Car insurance provider towards repair of the Toyota Camry after the vehicle crash incident of July 10th, 2012. An expense of \$11,000 for repairing a Toyota Camry, model year 2011 involved in a crash incident is a noteworthy indication of the substantial degree of damages the vehicle incurred.
15. Expenses of over \$11,000 were claimed towards recent diagnostic testing including CT Scans and medical care fees for a single hospital visit in February 2014. This would be a noteworthy indicator of average expenses for diagnostic testing and related medical care for maintaining the Plaintiff's health.
16. As per the average expectancy tables published by U.S. Department of Labor, Bureau of Labor Statistics, the Plaintiff has over 18 active work-life years remaining and over 31 years of life expectancy remaining as of the time of filing of this complaint.
17. The Plaintiff's complaints in aforesaid statements are the proximate causes or proximate contributing causes for his Physical and Personal injuries and financial distress caused by the vehicle crash incident.

18. Plaintiff has suffered both pecuniary and non-pecuniary losses and damages including:
- a. Medical, diagnostic testing and related expenses past, present and future.
 - b. Permanent loss of wage earning capacity equivalent to time of incident in 2012.
 - c. Physical pain and emotional suffering, past, present and future.
 - d. Permanent damage to health and the resulting anguish, hardship and expenses.
 - e. Life care expenses.
 - f. Other damages as allowed.
19. The Defendant, TOYOTA MOTOR CORPORATION is a global corporation, along with groups of subsidiaries, affiliates and dealerships in United States and globally, is engaged in design, manufacturing, assembling, marketing, sales and distribution of Motor vehicles, including but not limited to Toyota Camry Model year 2011.
20. The Plaintiff's physical and personal injuries, pain, suffering, damage to health, loss of life's many enjoyments, emotional distress caused due to the failure of airbags to deploy during a life-threatening vehicle crash incident of July 10th, 2012 are irrevocable.

WHEREFORE, Plaintiff demands judgment against the Defendant TOYOTA MOTOR CORPORATION in the sum of FIVE MILLION AND NO/100 DOLLARS (\$5,000,000.00) towards Personal Injury, aggravating conditions and resulting health damages, past and continuing or future lost wages, loss of earning capacity, past and continuing or future Medical expenses to list a few and HIS costs and other damages as allowed by Law.

RESPECTFULLY SUBMITTED, this 18th day of June 2014.

By: 

SATYAJIT SANYAL, Pro Se

Satyajit Sanyal

Mailing Address:

11654 Plaza America Drive, #622,

Reston, Virginia - 20190

Telephone: 551-208-4891 (Cell)

Commonwealth of Virginia - Department of Motor Vehicles
 Police Crash Report
 Revised Report
 FR300P (Rev 7/07) Page 1 of 5

Officer Initials **JHC** Badge # **5093**

Commonwealth of Virginia • Department of Motor Vehicles



FR300P (Rev 7/07)

Revised Report ☐

Police Crash Report

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CRASH

Crash Date **07/10/2012** Military Time (24 hr clock) **1050** County of Crash **FAIRFAX**City of **HERNDON** Local Case Number **201202821**

DRIVER INFORMATION

- 1** ☐ **1** ☐
- 1.1** ☐ **1.1** ☐
- ☐ 1. No Improper Action
- ☐ 2. Exceeded Speed Limit
- ☐ 3. Exceeded Safe Speed But Not Speed Limit
- ☐ 4. Overtaking On Hill
- ☐ 5. Overtaking On Curve
- ☐ 6. Overtaking at Intersection
- ☐ 7. Improper Passing of School Bus
- ☐ 8. Cutting In
- ☐ 9. Other Improper Passing
- ☐ 10. Wrong Side of Road - Not Overtaking
- ☐ 11. Did Not Have Right-of-Way
- ☐ 12. Following Too Close
- ☐ 13. Fail to Signal or Improper Signal
- ☐ 14. Improper Turn - Wide Right Turn
- ☐ 15. Improper Turn - Cut Corner on Left Turn
- ☐ 16. Improper Turn From Wrong Lane
- ☐ 17. Other Improper Turn
- ☐ 18. Improper Backing
- ☐ 19. Improper Start From Parked Position
- ☐ 20. Disregarded Officer or Flagger
- ☐ 21. Disregarded Traffic Signal
- ☐ 22. Disregarded Stop or Yield Sign
- ☐ 23. Driver Distraction
- ☐ 24. Fail to Stop at Through Highway - No Sign
- ☐ 25. Driver Through Work Zone
- ☐ 26. Fail to Set Out Flares or Flags
- ☐ 27. Fail to Dim Headlights
- ☐ 28. Driving Without Lights
- ☐ 29. Improper Parking Location
- ☐ 30. Avoiding Pedestrian
- ☐ 31. Avoiding Other Vehicle
- ☐ 32. Avoiding Animal
- ☐ 33. Crowded Off Highway
- ☐ 34. Hit and Run
- ☐ 35. Car Ran Away - No Driver
- ☐ 36. Blinded by Headlights
- ☐ 37. Other
- ☐ 38. Avoiding Object in Roadway
- ☐ 39. Eluding Police
- ☐ 40. Fail to Maintain Proper Control
- ☐ 41. Improper Passing
- ☐ 42. Improper or Unsafe Lane Change
- ☐ 43. Over Correction

- 1.1** ☐ **1.1** ☐
- ☐ 1. No Defects
- ☐ 2. Eyesight Defective
- ☐ 3. Hearing Defective
- ☐ 4. Other Body Defects
- ☐ 5. Illness
- ☐ 6. Fatigued
- ☐ 7. Apparently Asleep
- ☐ 8. Other
- ☐ 9. Interview

- 1** ☐ **1** ☐
- 1.1** ☐ **1.1** ☐
- ☐ 1. Not Obscured
- ☐ 2. Rain, Snow, etc. on Windshield
- ☐ 3. Windshield Otherwise Obscured
- ☐ 4. Vision Obscured by Load on Vehicle
- ☐ 5. Trees, Crops, etc.
- ☐ 6. Building
- ☐ 7. Embankment
- ☐ 8. Sign or Signboard
- ☐ 9. Hillcrest
- ☐ 10. Parked Vehicle(s)
- ☐ 11. Moving Vehicle(s)
- ☐ 12. Sun or Headlight Glare
- ☐ 13. Other
- ☐ 14. Blind Spot
- ☐ 15. Smoke/Dust
- ☐ 16. Stopped Vehicle(s)

- 1.1** ☐ **1.1** ☐
- ☐ 1. Looking at Roadside Incident
- ☐ 2. Driver Fatigue
- ☐ 3. Looking at Scenery
- ☐ 4. Passenger(s)
- ☐ 5. Radio/CD, etc.
- ☐ 6. Cell Phone
- ☐ 7. Eyes Not on Road
- ☐ 8. Daydreaming
- ☐ 9. Eating/Drinking
- ☐ 10. Adjusting Vehicle Controls
- ☐ 11. Other
- ☐ 12. Navigation Device
- ☐ 13. Texting
- ☐ 14. No Driver Distraction

- 1.1** ☐ **1.1** ☐
- ☐ 1. Had Not Been Drinking
- ☐ 2. Drinking - Obviously Drunk
- ☐ 3. Drinking - Ability Impaired
- ☐ 4. Drinking - Ability Not Impaired
- ☐ 5. Drinking - Not Known Whether Impaired
- ☐ 6. Unknown

- 1.1** ☐ **1.1** ☐
- ☐ 1. Blood
- ☐ 2. Breath
- ☐ 3. Refused
- ☐ 4. No Test

- 1.1** ☐ **1.1** ☐
- ☐ 1. Yes
- ☐ 2. No
- ☐ 3. Unknown

VEHICLE INFORMATION

- 1** ☐ **1** ☐
- 1.1** ☐ **1.1** ☐
- ☐ 1. Going Straight Ahead
- ☐ 2. Making Right Turn
- ☐ 3. Making Left Turn
- ☐ 4. Making U-Turn
- ☐ 5. Slowing or Stopping
- ☐ 6. Merging Into Traffic Lane
- ☐ 7. Starting From Parked Position
- ☐ 8. Stopped in Traffic Lane
- ☐ 9. Ran Off Road - Right
- ☐ 10. Ran Off Road - Left
- ☐ 11. Parked
- ☐ 12. Backing
- ☐ 13. Passing
- ☐ 14. Changing Lanes
- ☐ 15. Other
- ☐ 16. Entering Street From Parking Lot

- 1.1** ☐ **1.1** ☐
- ☐ 1. Before Application of Brakes
- ☐ 2. After Application of Brakes
- ☐ 3. Before and After Application of Brakes
- ☐ 4. No Visible Skid Mark/Tire Mark

- 1.1** ☐ **1.1** ☐
- ☐ 1. Passenger Car
- ☐ 2. Truck - Pick-up/Passenger Truck
- ☐ 3. Van
- ☐ 4. Truck - Single Unit Truck (2-Axes)
- ☐ 5. Motor Home, Recreational Vehicle
- ☐ 6. Special Vehicle - Oversized Vehicle/Earthmover/Road Equipment
- ☐ 7. Bicycle
- ☐ 8. Moped
- ☐ 9. Motorcycle
- ☐ 10. Emergency Vehicle (Regardless of Vehicle Type)
- ☐ 11. Bus - School Bus
- ☐ 12. Bus - City Transit Bus/Private Owned Church Bus
- ☐ 13. Bus - Commercial Bus
- ☐ 14. Other (Scooter, Go-cart, Hearsa, Bookmobile, Golf Cart, etc.)
- ☐ 15. Special Vehicle - Farm Machinery
- ☐ 16. Special Vehicle - ATV
- ☐ 17. Special Vehicle - Low-Speed Vehicle
- ☐ 18. Truck - Sport Utility Vehicle (SUV)
- ☐ 19. Truck - Single Unit Truck (3 Axes or More)
- ☐ 20. Truck - Truck Tractor (Bobtail-No Trailer)

- 1** ☐ **1** ☐
- 1.1** ☐ **1.1** ☐
- ☐ 1. Unknown
- ☐ 2. No Damage
- ☐ 3. Overturned
- ☐ 4. Motor
- ☐ 5. Undercarriage
- ☐ 6. Totaled
- ☐ 7. Fire
- ☐ 8. Other

- 1.1** ☐ **1.1** ☐
- ☐ 1. No Defects
- ☐ 2. Lights Defective
- ☐ 3. Brakes Defective
- ☐ 4. Steering Defective
- ☐ 5. Puncture/Blowout
- ☐ 6. Worn or Slick Tires
- ☐ 7. Motor Trouble
- ☐ 8. Chains In Use
- ☐ 9. Other
- ☐ 10. Vehicle Altered
- ☐ 11. Errors Defective
- ☐ 12. Power Train Defective
- ☐ 13. Suspension Defective
- ☐ 14. Windows/Windshield Defective
- ☐ 15. Wipers Defective
- ☐ 16. Wheels Defective
- ☐ 17. Exhaust System

- 1.1** ☐ **1.1** ☐
- ☐ 1. No Special Function
- ☐ 2. Taxi
- ☐ 3. School Bus (Public or Private)
- ☐ 4. Transit Bus
- ☐ 5. Intercity Bus
- ☐ 6. Charter Bus
- ☐ 7. Other Bus
- ☐ 8. Military
- ☐ 9. Police
- ☐ 10. Ambulance
- ☐ 11. Fire Truck
- ☐ 12. Tow Truck
- ☐ 13. Maintenance
- ☐ 14. Unknown

- 1.1** ☐ **1.1** ☐
- ☐ 1. Yes
- ☐ 2. No

- 1.1** ☐ **1.1** ☐
- ☐ 1. Yes
- ☐ 2. No

Officer Initials **JHC** Badge # **5093**

Commonwealth of Virginia • Department of Motor Vehicle



FR300P (Rev 7/07)

Revised Report

Police Crash Report

Page **3** of **5**

CRASH

Crash Date 07/10/2012	RELATIVE Time (24 hr clock) 1050	County of Crash FAIRFAX	City of <input type="radio"/> Town of HERNDON	Local Case Number 201202821
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CRASH INFORMATION

<input type="radio"/> 1. On Roadway <input checked="" type="radio"/> 2. Shoulder <input type="radio"/> 3. Median <input type="radio"/> 4. Roadside <input type="radio"/> 5. Gore <input type="radio"/> 6. Separator <input type="radio"/> 7. In Parking Lane or Zone <input type="radio"/> 8. Off Roadway, Location Unknown <input type="radio"/> 9. Outside Right-of-Way	<input type="radio"/> 1. No Traffic Control <input type="radio"/> 2. Officer or Flagger <input type="radio"/> 3. Traffic Signal <input type="radio"/> 4. Stop Sign <input type="radio"/> 5. Stop or Warning Sign <input type="radio"/> 6. Traffic Lanes Marked <input type="radio"/> 7. No Passing Lane <input type="radio"/> 8. Yield Sign <input type="radio"/> 9. One Way Road or Street <input type="radio"/> 10. Railroad Crossing With Markings and Signs <input type="radio"/> 11. Railroad Crossing With Signals <input type="radio"/> 12. Railroad Crossing With Gate and Signals <input type="radio"/> 13. Other <input type="radio"/> 14. Pedestrian Crosswalk <input type="radio"/> 15. Reduced Speed - School Zone <input type="radio"/> 16. Reduced Speed - Work Zone <input type="radio"/> 17. Highway Safety Corridor	<input type="radio"/> 1. Two-Way, Not Divided <input type="radio"/> 2. Two-Way, Divided, Unprotected Median <input checked="" type="radio"/> 3. Two-Way, Divided, Positive Median Barrier <input type="radio"/> 4. One-Way, Not Divided <input type="radio"/> 5. Unknown	<input checked="" type="radio"/> 1. Not at Intersection <input type="radio"/> 2. Two Approaches <input type="radio"/> 3. Three Approaches <input type="radio"/> 4. Four Approaches <input type="radio"/> 5. Five-Point, or more <input type="radio"/> 6. Roundabout
<input checked="" type="radio"/> 1. No Adverse Conditions (Clear/Cloudy) <input type="radio"/> 3. Fog <input type="radio"/> 4. Mist <input type="radio"/> 5. Rain <input type="radio"/> 6. Snow <input type="radio"/> 7. Sleet/Hail <input type="radio"/> 8. Smoke/Dust <input type="radio"/> 9. Other <input type="radio"/> 10. Blowing Sand, Soil, Dirt, or Snow <input type="radio"/> 11. Severe Crosswinds	<input type="radio"/> 1. Straight - Level <input type="radio"/> 2. Curve - Level <input type="radio"/> 3. Grade - Straight <input type="radio"/> 4. Grade - Curve <input type="radio"/> 5. Hillcrest - Straight <input type="radio"/> 6. Hillcrest - Curve <input type="radio"/> 7. Dip - Straight <input type="radio"/> 8. Dip - Curve <input type="radio"/> 9. Other <input type="radio"/> 10. On/Off Ramp	<input checked="" type="radio"/> 1. No Defects <input type="radio"/> 2. Holes, Ruts, Bumps <input type="radio"/> 3. Soft or Low Shoulder <input type="radio"/> 4. Under Repair <input type="radio"/> 5. Loose Material <input type="radio"/> 6. Restricted Width <input type="radio"/> 7. Slick Pavement <input type="radio"/> 8. Roadway Obstructed <input type="radio"/> 9. Other <input type="radio"/> 10. Edge Pavement Drop Off	<input type="radio"/> 1. Yes <input checked="" type="radio"/> 2. No
<input type="radio"/> 1. Dawn <input checked="" type="radio"/> 2. Daylight <input type="radio"/> 3. Dusk <input type="radio"/> 4. Darkness - Road Lighted <input type="radio"/> 5. Darkness - Road Not Lighted <input type="radio"/> 6. Darkness - Unknown Road Lighting <input type="radio"/> 7. Unknown	<input checked="" type="radio"/> 1. Dry <input type="radio"/> 2. Wet <input type="radio"/> 3. Snowy <input type="radio"/> 4. Icy <input type="radio"/> 5. Muddy <input type="radio"/> 6. Oil/Other Fluids <input type="radio"/> 7. Other <input type="radio"/> 8. Natural Debris <input type="radio"/> 9. Water (Standing, Moving) <input type="radio"/> 10. Slush <input type="radio"/> 11. Sand, Dirt, Gravel	Interchange Area: <input checked="" type="radio"/> 1. Main-Line Roadway <input type="radio"/> 2. Acceleration/Deceleration Lanes <input type="radio"/> 3. Gore Area (Between Ramp and Highway Edgelines) <input type="radio"/> 4. Collector/Distributor Road <input type="radio"/> 5. On Entrance/Exit Ramp <input type="radio"/> 6. Intersection at end of Ramp <input type="radio"/> 7. Other location not listed above within an Interchange area (median, shoulder and roadside)	<input type="radio"/> 1. With Law Enforcement <input type="radio"/> 2. With No Law Enforcement <input type="radio"/> 3. No Workers Present
<input checked="" type="radio"/> 1. Yes - Working <input type="radio"/> 2. Yes - Working and Obscured <input type="radio"/> 3. Yes - Not Working <input type="radio"/> 4. Yes - Not Working and Obscured <input type="radio"/> 5. Yes - Missing <input type="radio"/> 6. No Traffic Control Device Present	<input type="radio"/> 1. Concrete <input checked="" type="radio"/> 2. Blacktop, Asphalt, Bituminous <input type="radio"/> 3. Brick or Block <input type="radio"/> 4. Flag, Gravel, Stone <input type="radio"/> 5. Dirt <input type="radio"/> 6. Other	<input type="radio"/> 8. Non-Intersection <input type="radio"/> 9. Within Intersection <input type="radio"/> 10. Intersection-Related - Within 150' <input type="radio"/> 11. Intersection-Related - Outside 150'	<input type="radio"/> 1. Advance Warning Area <input type="radio"/> 2. Transition Area <input type="radio"/> 3. Activity Area <input type="radio"/> 4. Termination Area
		Other Location: <input type="radio"/> 12. Crossover Related <input type="radio"/> 13. Driveway, Alley-Access - Related <input type="radio"/> 14. Railway Grade Crossing <input type="radio"/> 15. Other Crossing (Crossings for Bikes, School, etc.)	<input type="radio"/> 1. Lane Closure <input type="radio"/> 2. Lane Shift/Crossover <input type="radio"/> 3. Work on Shoulder or Median <input type="radio"/> 4. Intermittent or Moving Work <input type="radio"/> 5. Other
			<input type="radio"/> 1. Yes <input type="radio"/> 2. Yes - With School Activity <input checked="" type="radio"/> 3. No
			<input type="radio"/> 1. Rear End <input type="radio"/> 2. Angle <input type="radio"/> 3. Head On <input type="radio"/> 4. Sideswipe - Same Direction <input type="radio"/> 5. Sideswipe - Opposite Direction <input type="radio"/> 6. Fixed Object in Road <input type="radio"/> 7. Train <input type="radio"/> 8. Non Collision <input checked="" type="radio"/> 9. Fixed Object - Off Road <input type="radio"/> 10. Deer <input type="radio"/> 11. Other Animal <input type="radio"/> 12. Pedestrian <input type="radio"/> 13. Bicyclist <input type="radio"/> 14. Motorcyclist <input type="radio"/> 15. Backed Into <input type="radio"/> 16. Other

Officer Initials **JHC** Badge # **5093**

Commonwealth of Virginia - Department of Motor Vehicles

FR300P (Rev 7/07)

Revised Report ☐

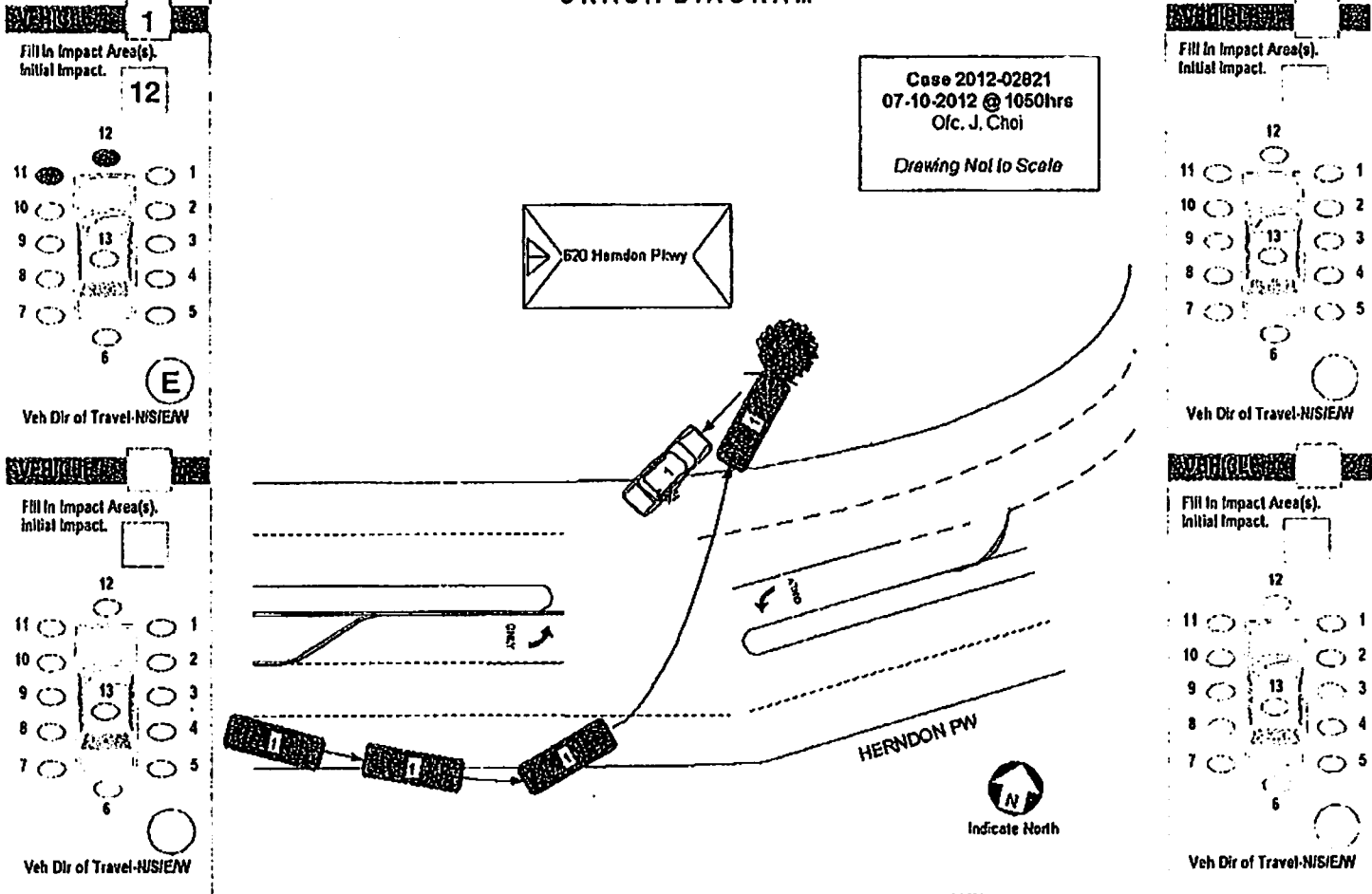
Police Crash Report

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CRASH

Crash Date **07/10/2012** Military Time (24 hr clock) **1050** County of Crash **FAIRFAX** City of ☐ Town of **HERNDON** Local Case Number **201202821**

CRASH DIAGRAM



DAMAGE TO PROPERTY OTHER THAN VEHICLES

Approx. Repair Cost	Object Struck (Tree, Fence, etc.)	Property Owner's name (Last, First, Middle)	Address	VDOT Property

CRASH DESCRIPTION

* * * See Attached Narrative * * *

CRASH EVENTS

Vehicle #	First Event	Second Event	Third Event	Fourth Event	Most Harmful Event
1	13	2	28		
Vehicle #	First Event	Second Event	Third Event	Fourth Event	Most Harmful Event

First Harmful Event of Entire Crash that Results in First Injury or Damage.

13

COLLISION WITH FIXED OBJECT

1. Bank or Ledge
2. Trees
3. Utility Pole
4. Fence or Post
5. Guard Rail
6. Parked Vehicle
7. Tunnel, Bridge, Underpass, Culvert, etc.
8. Sign, Traffic Signal
9. Impact with Non-Fixed Object
10. Other
11. Jersey Wall
12. Building/Structure
13. Curb
14. Ditch
15. Other Fixed Object
16. Other Traffic Barrier
17. Traffic Sign Support
18. Mailbox

COLLISION WITH PERSON, MOTOR VEHICLE OR NON-FIXED OBJECT

19. Pedestrian
20. Motor Vehicle in Transport
21. Train
22. Bicycle
23. Animal
24. Work Zone
25. Other Movable Object
26. Unknown Movable Object
27. Other

NON-COLLISION

28. Ran Off Road
29. Jack Knife
30. Overturn (Rollover)
31. Downhill Runaway
32. Cargo Loss or Shift
33. Explosion or Fire
34. Separation of Units
35. Cross Median
36. Cross Centerline
37. Equipment Failure (Tire, etc)
38. Immersion
39. Fell/Jumped From Vehicle
40. Thrown or Falling Object
41. Non-Collision Unknown
42. Other Non-Collision

Officer Initials **JHC** Badge # **5093**

Commonwealth of Virginia - Department of Motor Vehicles

FR300P (Rev 7/07)

Revised Report ☐**Police Crash Report**Page **5** of **5****CRASH**

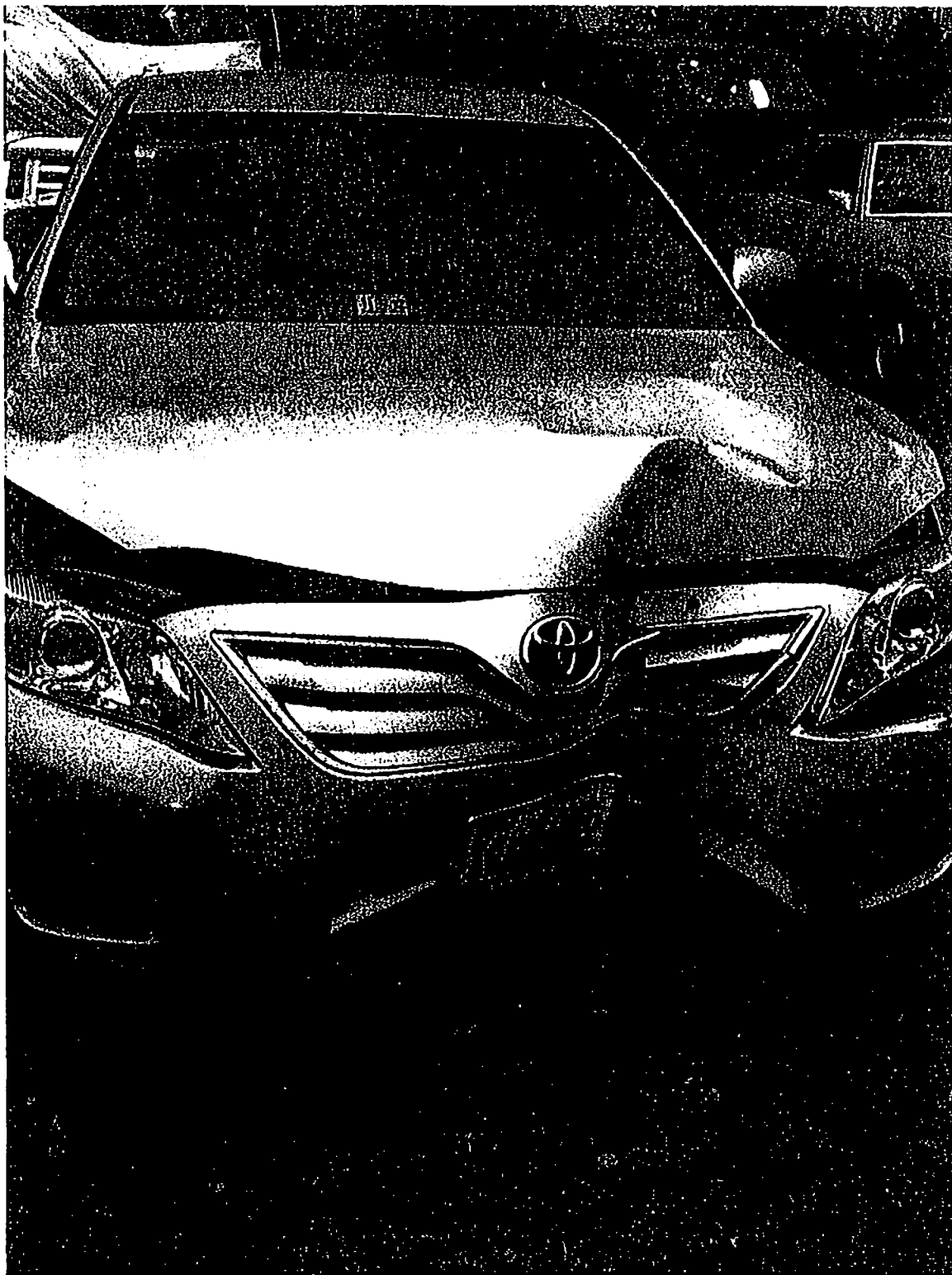
Crash Date	MILITARY Time (24 hr clock)	County of Crash	City of Town of	Local Case Number
07/10/2012	1050	FAIRFAX	HERNDON	201202821

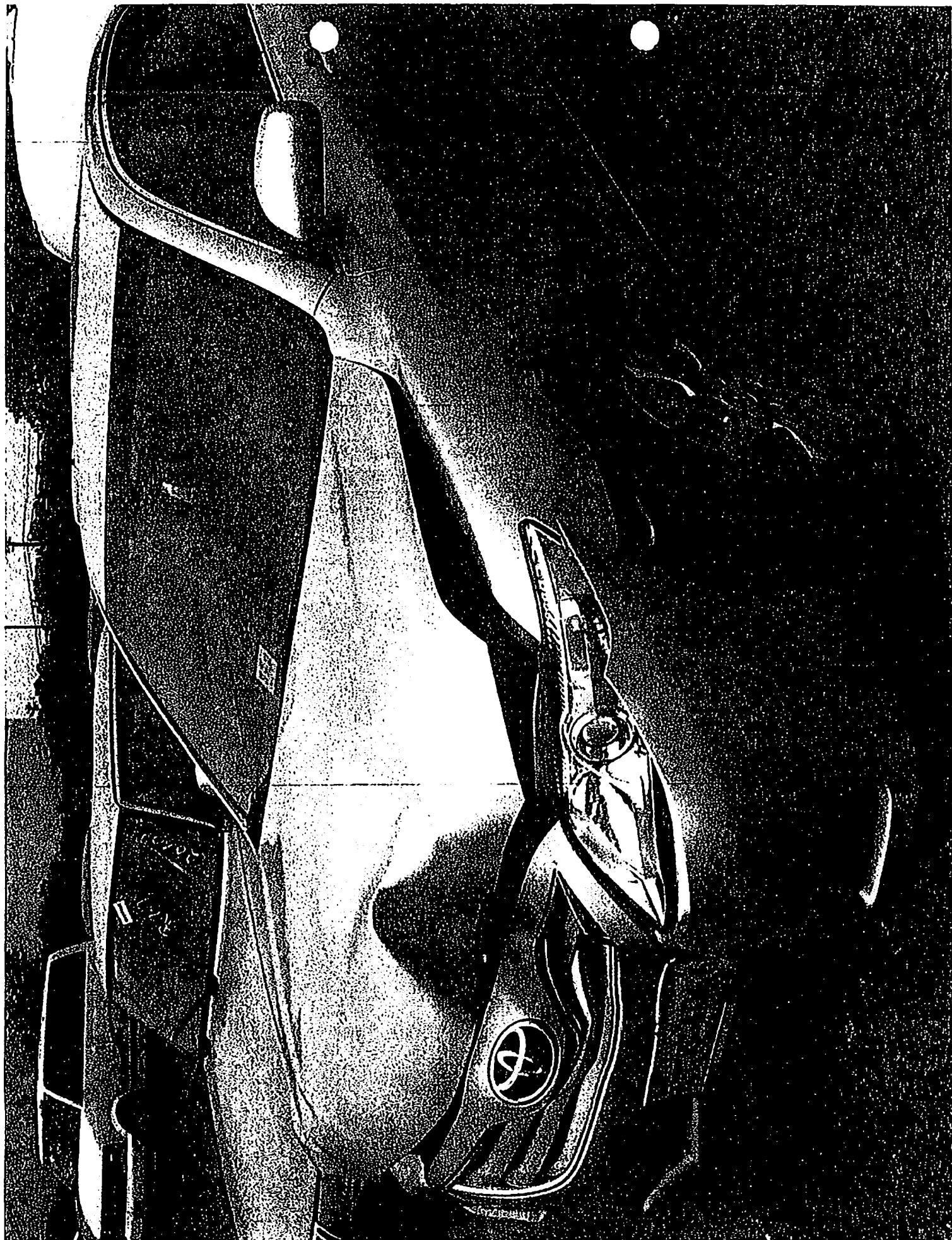
CRASH DESCRIPTION continued

Single vehicle ran off the road eastbound on the right and traveled on the sidewalk for a short distance before veering to the left, crossing the westbound traffic lanes and struck a tree off of the roadway. There was significant front end damage to the vehicle, the motor had stalled out, the doors of the vehicle were locked, and the driver appeared to have lost consciousness. A witness tried to get the driver's attention by calling out to him while tapping on the driver's window repeatedly without success.

Sgt Pihonak utilized a haligan bar to provide emergency, potentially life-saving entry into the vehicle to not only access the patient, but provide air flow into the vehicle on this near 90degree day. Once access was gained and fresh air entered the vehicle, the driver gained a low degree of consciousness but was unable to speak. Rescue personnel arrived on scene, screened the driver for a diabetic emergency with negative results but did note significantly diminished response from the left side of his body. The driver was transported by Medic ambulance to Reston Hospital.

The vehicle was towed by Henry's wrecker service.







County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods, and diverse communities of Fairfax County

June 17, 2014

Steve Souder, Director

Satyajit Sanyal
11654 Plaza America Drive, #622
Reston, Virginia 20190

Cynthia A. Bird ShROUT,
Assistant Director 9-1-1
Dispatch Operations
Bureau

RE: 2014-FOIA-087

Roy L. Oliver, Assistant
Director Support Bureau

Greetings Satyajit,

This letter is in response to your Virginia Freedom of Information Act request in reference to obtaining audio an audio recording and records regarding a motor vehicle accident, involving you, that occurred on July 10, 2012 along the 600 block of Herndon Parkway.

I have determined that your request is releasable pursuant to the Virginia Freedom of Information Act however; as provided in Section § 2.2-3706 (G) (1) of the Code of Virginia, identifying information must be redacted (i.e. – complainant information, phone numbers, etc.), therefore, I am unable to provide you with a name or contact information regarding the individual that reported the incident.

Additionally, this department maintains audio recordings for a period of 180 days; therefore, any recordings from the aforementioned date have been destroyed.

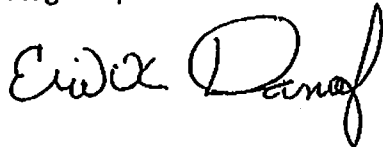
All that can be provided at this point is a redacted dispatch log containing the information that was reported. You will find the log attached. Please note that this log contains redundant information, as it was entered into the dispatch system more than once.

Department of Public Safety Communications
4890 Alliance Drive, Ste 2401
Fairfax, Virginia 22030-6661
571-350-1710, TTY 711
Facsimile 703-631-2789
www.fairfaxcounty.gov/911



Should you have any questions or need further assistance, please do not hesitate to contact me at 571-350-170, and reference internal order number 2014-FOIA-087

Regards,



Erikk R. Daniel
Custodian of Records
Fairfax County Department of Public Safety Communications
(571) 350-1703
erikk.daniel@fairfaxcounty.gov

Attachments: redacted dispatch log for DPSC event E121921234

Department of Public Safety Communications
4890 Alliance Drive, Ste 2401
Fairfax, Virginia 22030-6661
571-350-1710, TTY 711
Facsimile 703-631-2789
www.fairfaxcounty.gov/911



Event Search

Event Date Event Time
 07/10/12 10:32:42

Event Number: B121921234

<u>Agency</u>	<u>Type</u>	<u>Subtype</u>	<u>ESZ</u>	<u>Area</u>	<u>Group</u>
FIRE	ACCITF		406	404	F4
FIRE	ACCITF		406	404	F1

Location: 620 HERNDON PKWY , Apt: , Mun: HRND

Comments:
 Xstreets: EXCHANGE PL
 VAN BUREN ST

Caller Name: [REDACTED]
 Caller Addr: [REDACTED]
 Caller Phone: [REDACTED]
 Call Source: RADIO

Remarks:
 10:28:53 303012 ** LOI search completed at 07/10/12 10:28:53
 10:28:53 303012 MAN DRIVING SIL TOYT RAN INTO CURB AND HIT TREE
 10:28:53 303012 MAN APPEARS TO BE STUCK IN VEH
 10:29:07 303012 ** LOI search completed at 07/10/12 10:29:07
 10:29:07 303012 ** Event Location changed from "554 HERNDON PKWY HRND
 TOWN" to "544 HERNDON PKWY
 10:29:07 303012 HRND TOWN" at: 07/10/12 10:29:07
 10:29:07 303012 ** >>>> by terminal: rif2
 10:29:23 307797 ** Event B121921234 transferred on update by 111156 on fd01
 10:29:23 307797 ** Event B121921234 transferred from FIRE/F1 to FIRE/F4 as
 B121921234 at
 10:29:23 307797 07/10/12 10:29:23
 10:29:34 307797 ** Recommended unit E436 for requirement E (3.47 min)
 10:29:34 307797 ** Recommended unit R421 for requirement R (11.46 min)
 10:29:34 307797 ** Recommended unit M431 for requirement M (4.39 min)
 10:29:34 307797 ** Recommended unit M425 for requirement M (5.56 min)
 10:29:34 307797 ** Recommended unit EMS405 for requirement EMS (9.58 min)
 10:29:34 307797 ** Recommended unit BC405 for requirement BC (13.29 min)
 10:29:45 303012 DRIVER'S EYES ARE CLOSED--BUT BODY IS MOVING--POSS
 BREATHING

6/16/2014 3:16:10 PM

Event_Search

Page 1

10:30:03 303012 TAPPING WINDOW AND NOT RESPONDING
 10:31:07 303012 VEH IS STILL ON
 10:31:13 301207 HERNDON PD DIRECT
 10:32:42 303012 ** LOI search completed at 07/10/12 10:32:42
 10:32:42 303012 ** Event Location changed from "544 HERNDON PKWY HRND
 TOWN" to "620 HERNDON PKWY
 10:32:42 303012 HRND TOWN" at: 07/10/12 10:32:42
 10:32:42 303012 ** >>>> by terminal: rlf2
 10:32:42 303012 ** FIRE event E121921247 created
 10:32:46 303012 UPDATED LOC
 10:33:24 319090 Duplicate Event:Location = 620 HERNDON PKWY
 HRNDXST=EXCHANGE PL/VAN BUREN ST,
 10:33:24 319090 Type = ACCITF ACCIDENT W/INJ - POSSIBLY TRAPPED, Caller
 Name = [REDACTED]
 10:33:24 319090 Caller Ph Number = [REDACTED] RADIO, Alarm Level = 1
 10:33:25 319090 SAME
 10:33:25 319090 ** LOI search completed at 07/10/12 10:28:53
 10:33:25 319090 MAN DRIVING SIL TOYT RAN INTO CURB AND HIT TREE
 10:33:25 319090 MAN APPEARS TO BE STUCK IN VEH
 10:33:25 319090 ** Event Location changed from "544 HERNDON PKWY HRND
 TOWN" to "544 HERNDON PKWY
 10:33:25 319090 ** LOI search completed at 07/10/12 10:29:07
 10:33:25 319090 HRND TOWN" at: 07/10/12 10:29:07
 10:33:25 319090 ** >>>> by terminal: rlf2
 10:33:25 319090 ** Event E121921234 transferred from FIRE/F1 to FIRE/F4 as
 E121921234 at
 10:33:25 319090 07/10/12 10:29:23
 10:33:25 319090 ** Event E121921234 transferred on update by 111156 on fd01
 10:33:25 319090 ** Recommended unit E436 for requirement E (3.47 min)
 10:33:25 319090 ** Recommended unit R421 for requirement R (11.46 min)
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 10:33:25 319090 DRIVER'S EYES ARE CLOSED--BUT BODY IS MOVING--POSS
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 10:33:25 319090 HERNDON PD DIRECT
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6/16/2014 3:16:10 PM

Event Search

Page 2

10:33:25 319090 Duplicate Event:Location = 620 HERNDON PKWY
 HRNDXST=EXCHANGE PL/VAN BUREN ST,
 10:33:25 319090 Type = ACCITF ACCIDENT W/INJ - POSSIBLY TRAPPED, Caller
 Name = [REDACTED]
 10:33:25 319090 Caller Ph Number = [REDACTED] RADIO, Alarm Level = 1
 10:33:25 319090 SAME
 10:33:25 319090 End of Duplicate Event data
 10:34:14 301207 FX01 DIRECT AND LISTENING
 10:34:47 301207 E436 -- COMMAND POST TIMER STARTED
 10:35:25 301207 E436 ONS--1 VEH U INTO TREE//OCC STILL INSIDE//HAS
 HERNDON PKWY COMMAND
 10:36:32 301207 PER COMMAND OCC NOT TRAPPED//HOLDING E436 M431//ALL
 OTHER UNITS CAN GO
 10:36:32 301207 INSERVICE//4D CLEAR
 10:36:38 301207 TIMER CANCELLED

Times:

<u>Add</u>	<u>Dispatch</u>	<u>Arrive</u>	<u>Close</u>	<u>Closing ID</u>	<u>C Terminal</u>	<u>Comments</u>
10:28:53	10:29:32	10:34:45	11:45:01	80110431	\$M431	
10:32:42			10:33:25	319090	fd03	Duplicate and Cancel

Case Number Event
 Number

Units	Car ID
BC405	75637
E436	77548
BMS405	75231
M425	76665
M431	76702
R421	70211

disposition

State of California
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 2nd
day of June, 2014, by Hope Park

proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.

(Seal) Signature [Signature]



SPS

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

Satyajit Sanyal vs Toyota Motor Corporation
Subtype: Complaint

CL2014-0008174
Defendant: Toyota Motor Corporation

STATE OF California

CITY/COUNTY OF Los Angeles to wit:

This day June 27, 2014

personally appeared before the undersigned Notary Public in and for the City/County and State
aforesaid, and, having been first duly sworn according to law, disposes and states as follows: that
he/she is not a party to, or otherwise interested in, the subject matter in controversy in the within
cause, that he/she is over the age of 18 years; that on the 27th day of June, 2014 at
2:40 pm o'clock 0 m. he/she served the within Complaint, in person, on the Defendant

Toyota Motor Corporation at 19001 S. Western Ave
Serving the U.S. Headquarters of Toyota Motor in America
the Great California Company to the Parent
Japanese Company at 19001 S. Western Avenue, Torrance,
CA 90501

and the Defendant is/is not a
resident of the State of Virginia To Melissa Doe, Legal Deputy for Plaintiff
5'5" 200 lbs

[Signature] AFFIANT registered Power
TITLE Service

I then after mailed copies to
the same on June 27, 2014 from Los Angeles, CA

Subscribed and sworn to before me in my City/County and State aforesaid, this

____ day of _____, 20____

California Just attached
Notary ID #: _____

NOTARY PUBLIC

My Commission expires: _____